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Attorneys for Greg Vartanian, Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**


**GREG VARTANIAN, on behalf
of himself and all others similarly situated,**

Plaintiffs,

VS.

**NATIONWIDE LEGAL, INC.,
NATIONWIDE LEGAL, LLC, and
DOES 1-100, inclusive.**

Defendant.



Case No. 3:12-cv-00691-EMC

JOINT STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINES

Plaintiff, Greg Vartanian, individually, and on behalf of putative class members (“Plaintiffs”), and Defendants, Nationwide Legal, Inc. and Nationwide Legal, LLC (“Defendants”), through their undersigned attorneys, stipulate and respectfully request that this Court approve an extension of time for completion of mediation from April 29, 2013 to June 28, 2013; (b) continue the status conference from May 9, 2013 to July 11, 2013; (c) continue the deadline for Plaintiff to serve his FLSA 216(b) and Rule 23 Class Certification motion from July 16, 2013 to September 13, 2013; and (d) continue the hearing on class certification to from August 22, 2013 to October 31, 2013. As grounds for this extension, the parties state as follows:

1 1. On February 21, 2013 the parties filed a Notice of Stipulation and Order re
2 Continuance of Mediation Completion Date (Doc. 52) requesting that (a) the mediation deadline
3 be moved to April 29, 2013; (b) the status conference be continued to May 6, 2013; and (c)
4 continuing the deadline for Plaintiff to serve his FLSA and Rule 23 Motion for Class
5 Certification to July 16, 2013.
6

7 2. This Court entered an Order (Doc. 53) on February 25, 2013 (a) continuing the
8 mediation completion date to April 29, 2013; (b) continuing the status conference to May 9,
9 2013 at 10:30 a.m.; (c) continuing the deadline for Plaintiff to serve his FLSA 216(b) and Rule
10 23 Class Certification Motion to July 16, 2013; and (d) continuing the hearing on class
11 certification to August 22, 2013 at 1:30 p.m.
12

13 3. The parties were scheduled to mediate this matter on April 24, 2013 with Carol
14 Woodward in San Francisco.
15

16 4. On Sunday, April 21, 2013 Robert Camp, lead counsel for the Plaintiff, had to
17 cancel the mediation due to his father-in-law's terminal illness, which required he and his family
18 to assist in caring for his father-in-law. On April 25, 2013, hospice evaluated the undersigned's
19 father-in-law and determined that he had a two to three week life expectancy. The undersigned
20 has been out of the office with his father-in-law since April 21, 2013 and does not expect to be
21 able to return until the middle of May.
22

23 5. The undersigned has been the key attorney involved in discussions with defense
24 counsel, reviewing documents and calculating damages and, as such, is necessary to the
25 mediation process.
26

27 6. The undersigned conferred with the mediator and Defendant's counsel on April
28 21, 2013 to apprise them of the situation and neither is opposed to the requested extension.

7. For the above reasons, the parties request that the Court (a) extend the deadline for completion of mediation from April 29, 2013 to June 28, 2013; (b) continue the status conference from May 9, 2013 to July 11, 2013; (c) continue the deadline for Plaintiff to serve his FLSA 216(b) and Rule 23 Class Certification motion from July 16, 2013 to September 13, 2013; and (d) continue the hearing on class certification to October 31, 2013.

Dated: April 29, 2013

Respectfully submitted,

THE COCHRAN FIRM, LLC

/s/ Robert J. Camp

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NATIONWIDE LEGAL, LLC

IT IS SO ORDERED

Edward M. Chen
U.S. District Judge

